

IN THE DISTRICT COURT OF THE UNITED STATES
 FOR THE DISTRICT OF SOUTH CAROLINA
 BEAUFORT DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. 9:22-cr-00658-RMG
)	
vs.)	REQUEST FOR PROTECTION FROM
)	COURT APPEARANCE
RUSSELL LUCIUS LAFFITTE.)	
)	

Pursuant to Local Civil Rule 6.02, John L. Warren III, counsel for Movant John Nichols, respectfully requests this Honorable Court's protection from being called to hearings or other Court appearances in this case for the following dates through the end of 2022:¹

- **September 6, 2022:** Mr. Warren has a proffer scheduled at 10:00 AM in Columbia, which is expected to last all day.²
- **September 7 through 9, 2022:** Mr. Warren is arguing in opposition to a Motion to Dismiss in a case in the Court of Common Pleas for the Ninth Circuit (Charleston) at 2:30 PM on September 7, 2022—*John Doe v. CareAlliance Health Services, Inc., et al.*, No. 2022-CP-10-01097. Immediately following the hearing, Mr. Warren will be traveling to Washington, D.C. for a meeting at the Department of Justice, Human Rights and Special Prosecutions Section, on September 8, 2022, and will return to South Carolina on September 9, 2022. Mr. Warren's plane tickets and hotel room are prepaid and nonrefundable.
- **September 14 through 16, 2022:** Mr. Warren will be attending an out-of-state wedding for a family member in Connecticut from September 14 through 18, 2022. Mr. Warren's plane tickets and hotel room are prepaid and nonrefundable.
- **September 20, 2022:** Mr. Warren has a Pretrial Conference before Judge Herlong in Greenville, South Carolina at 9:30 a.m.³ See *United States v. Rahsaan Jackson Garth*, No. 6:22-cr-00703-HMH. Mr. Warren is the only counsel of record for the defendant.

¹ Pursuant to this Court's Special Instructions for Cases, the undersigned has submitted a Proposed Order to the Court's ECF email address.

² The undersigned can provide the Court, *in camera*, with the name of the case in which the proffer is being held.

³ The undersigned has filed a Motion for a Continuance. However, it has not yet been granted.

- **September 23, 2022:** Mr. Warren has a preplanned and prepaid family vacation out-of-state and will be travelling on Friday, September 23, 2022.
- **October 5 through 10, 2022:** Mr. Warren has a preplanned and prepaid family vacation out-of-state.
- **October 12 through 14, 2022:** Mr. Warren is an Adjunct Professor and Co-Director of the University of South Carolina School of Law's Moot Court Program. He will be travelling to Greensboro, North Carolina with a group of law students to coach them in the Billings, Exum, and Frye Moot Court Competition at Elon University School of Law.
- **October 26, 2022 (Afternoon):** Mr. Warren will be coordinating the Kate Bockman Moot Court Competition at the South Carolina Court of Appeals in Columbia, South Carolina beginning at 3:00 PM.
- **November 17 through 19, 2022:** Mr. Warren is scheduled to travel to Atlanta with a group of USC law students to coach them in the National Moot Court competition.
- **November 29, 2022:** Mr. Warren will be attending the annual United States Sentencing Guidelines Seminar in Greenville, South Carolina.

Respectfully Submitted,

/s/ John L. Warren III
John L. Warren III (Federal ID No. 12164)
Email: jw@billnettleslaw.com
Law Office of Bill Nettles
2008 Lincoln St.
Columbia, SC 29201
Tel: (803) 814-2826

Attorney for Movant John Nichols, in his Official Capacity as the Disciplinary Counsel for the Office of Disciplinary Counsel

September 2, 2022